

1 Michael J. Gearin, WSBA # 20982
David C. Neu, WSBA # 33143
2 Brian T. Peterson, WSBA # 42088
K&L GATES LLP
3 925 Fourth Avenue, Suite 2900
Seattle, WA 98104-1158
4 (206) 623-7580
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Honorable Christopher M. Alston
Chapter 11

8 UNITED STATES BANKRUPTCY COURT
9 WESTERN DISTRICT OF WASHINGTON
10 AT SEATTLE

11 In re:

12 NORTHWEST TERRITORIAL MINT, LLC,
Debtor.

Case No. 16-11767-CMA

DECLARATION OF MARK CALVERT IN
SUPPORT OF TRUSTEE'S MOTION FOR
AUTHORITY TO ABANDON AND
DESTROY RECORDS

14 Mark Calvert declares as follows:

15 1. I am the Chapter 11 Trustee of Northwest Territorial Mint, LLC ("NWTM" or
16 "Debtor") pursuant to the Court's order of appointment dated April 11, 2016. I am over eighteen
17 (18) years of age and I am competent in all ways to testify. Unless otherwise stated, I make the
18 following statements based on my personal knowledge. I submit this Declaration in Support of
19 Trustee's Motion for Authority to Abandon and Destroy Records (the "Motion").

20 2. Upon my appointment, I took control over the business operations of the Debtor and
21 initiated my investigation of the financial affairs of the bankruptcy estate. I have worked for more
22 than 20 months to maintain and grow the business of the Northwest Territorial Mint. Unfortunately,
23 the business has not been profitable since the Spring of 2017 and I have run out of cash to continue
24 to operate the business. I closed the business on December 29, 2017 after working for many months
25 to sell the business as a going concern.
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500993110 v2

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SEATTLE, WASHINGTON 98104-1158
TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022

1 3. NWTM's primary manufacturing facility is located in Dayton, Nevada. There are
2 many files and boxes of company records that date back as far as the 1990s. I have determined that
3 these records have no value to NWTM or the bankruptcy estate. I am seeking to liquidate the
4 remaining assets of the bankruptcy estate and will need to vacate the Dayton premises following the
5 completion of his liquidation efforts. The company records must be disposed of before the Dayton
6 premises are vacated. I request authority to abandon or destroy all company records that date back
7 to before the year 2013. I am unaware of any litigation or other bankruptcy estate matters for which
8 such records could become relevant. I will maintain more recent records, those from 2013 on.

9 I declare under the penalty of perjury under the laws of the United States that the foregoing is
10 true and correct to the best of my knowledge.

11 EXECUTED this 22 day of March, 2018, at Seattle, Washington.

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14 _____
15 Mark Calvert
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CERTIFICATE OF SERVICE

The undersigned declares as follows:

That she is a Paralegal in the law firm of K&L Gates LLP, and on March 22, 2018, she caused the foregoing document to be filed electronically through the CM/ECF system which caused Registered Participants to be served by electronic means, as fully reflected on the Notice of Electronic Filing.

Also on March 22, 2018, she caused the foregoing document to be placed in the mail to the Parties at the addresses listed below:

Northwest Territorial Mint LLC
c/o Ross Hansen, Member
P.O. Box 2148
Auburn, WA 98071-2148

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

Executed on the 22nd day of March, 2018 at Seattle, Washington.

/s/ Denise A. Lentz
Denise A. Lentz

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